

EXHIBIT A

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF TENNESSEE
3 AT NASHVILLE

4 GLOBAL FORCE ENTERTAINMENT,
5 INC. and JEFFREY JARRETT,

6 Plaintiffs,

7 vs.

8 ANTHEM SPORTS & ENTERTAINMENT
9 CORP., and ANTHEM WRESTLING
10 EXHIBITIONS, LLC,

11 Defendants.

CASE NO. 3:18-cv-00749
CHIEF JUDGE WAVERLY D.
CRENSHAW, JR.
MAGISTRATE JUDGE

JOE B. BROWN

12 Deposition of:

13 JEFFREY JARRETT 30(b)(6)
14 GLOBAL FORCE ENTERTAINMENT, INC.

15 Taken on behalf of the Defendants
16 November 19, 2019

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21
22 Huseby Nashville
23 Deborah Harris Honeycutt, LCR
24 214 2nd Avenue North, Suite 207
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1 as a four-part series you were employed by Anthem
2 Wrestling?

3 MR. MILLER: Objection to form.

4 THE WITNESS: Yes.

5 BY MR. LEE:

6 Q. Going back to paragraph 112. At the end it
7 says: Likely to cause confusion. Are you aware of
8 any actual confusion by any customers with respect
9 to what the alleged Anthem improper use of the
10 Global Force Wrestling or GFW marks?

11 A. Can you clarify the question? I want to make
12 sure. Am I aware --

13 Q. Are you aware of any actual confusion by
14 consumers or customers of Anthem Wrestling's
15 allegedly improper use of the Global Force Wrestling
16 or GFW marks?

17 A. Yes.

18 Q. Tell me, what is it?

19 A. From the time that we split through generally
20 most of 2018, the wrestling fans continued to ask
21 questions in general like are you a part of Impact?
22 Did you leave Global Force and Impact? Does Impact
23 own GFW? Does GFW own Impact? Just general
24 confusion in the marketplace on where things stood.

25 Q. Similar to kind of that newspaper article we

1 looked at earlier from June of 2017, where even in
2 that article there was the Tennessean article where
3 he's talking about GFW where, again, it's not --
4 even the author of that article wasn't necessarily
5 accurately kind of stating things there? It's that
6 type of confusion? It's similar to that type of
7 confusion?

8 MR. MILLER: Objection to form.

9 THE WITNESS: I don't -- I -- I would --
10 I would not classify them exclusively in the same
11 category.

12 BY MR. LEE:

13 Q. Okay. So after the split through 2018, when
14 the wrestling fans would have this type of
15 confusion, how was that conveyed to you? Who was
16 that conveyed to, to you individually or to Global
17 Force Entertainment?

18 A. Both.

19 Q. How did they convey that confusion to you?

20 A. To me personally, at events, conventions,
21 wrestling shows, wrestling events. And then on --
22 through social media.

23 Q. Do you have -- so what social media accounts
24 does Global Force Entertainment have?

25 A. Instagram, YouTube, Twitter, Facebook.